

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

NEXT CLEANERS, LLC,

Plaintiff,

-against-

JONATHAN MIODUSZEWSKI,  
JON SIMKOWITZ, YELLOW BEAR  
CLEANERS (WESTFIELD), and YELLOW  
BEAR CLEANERS (CRANFORD),

Civil Action No.

17-cv-0222 (MCA) (MAH)

**STATUS REPORT AND  
CERTIFICATION OF COUNSEL**

Pursuant to 28 U.S.C. § 1746, I, **JULIO C. GOMEZ**, of full age certify as follows:

1. I am a solo practitioner for the firm GOMEZ LLC Attorney At Law, counsel for Plaintiff Next Cleaners, LLC in the above-captioned matter. I submit this Certification pursuant to the Court's Text Order dated March 31, 2021 (Dkt. No. 118).

2. Since the Court's March 31, 2021 Order the parties have continued to confer and make progress on settlement. Undersigned counsel has conducted numerous calls with SPOT, Plaintiffs' payment processing system vendor to coordinate a data pull that will form part of the consideration in the settlement being worked out between the parties.

3. Yesterday, Plaintiff and Defendant Mioduszewski conducted a Zoom teleconference with SPOT's representative and Mr. Mioduszewski was able to review, via Zoom share, an excel spreadsheet and confer with SPOT about its parameters and content. Mr. Mioduszewski requested additional information, to which Plaintiff has no objection, and SPOT has promised to respond by next week with additional data.

4. Plaintiff has transmitted to defendant Mioduszewski a draft written settlement

agreement these parties are finalizing negotiation on written terms and a payment schedule.

5. A written settlement with defendant Simkowitz is also being simplified now that settlement with all remaining defendants is imminent.

6. As a result, the parties jointly request three (3) additional weeks to submit executed settlement agreements and a proposed Order for the court to retain jurisdiction during the schedule payout of settlement funds.

7. Thank you for your attention to this request.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on April 29, 2021

s/ Julio C. Gomez

Julio C. Gomez

GOMEZ LLC ATTORNEY AT LAW  
1451 Cooper Road  
Scotch Plains, NJ 07023  
Tel 908.789.1080  
Fax 908.780.1081  
Email [jgomez@gomezllc.com](mailto:jgomez@gomezllc.com)